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June 30, 2020

BY ECF FILING

The Honorable Lewis J. Litman, United States District Judge
Southern District of New York
500 Pearl Street
NY, NY 10007

Re: USDC, SDNY, #19-cv-03489 (LJL), Jahumi Harrigan v. The City of New York

Gary S. Fish, Esq., (GSF) Request to Stay all proceedings herein, including but not limited to any plaintiff response to defendant motion to dismiss and Rule 11 sanctions motion, for thirty (30) days until plaintiff Jahumi Harrigan can obtain other counsel, and execute any substitution of attorney documents so required.

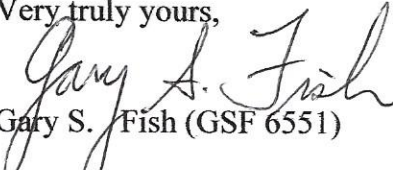
Dear Judge Litman,,


Please be advised that I am the attorney for plaintiff in the above captioned matter, in which you on May 20, 2020 (Court Document #65) granted defendant motion to dismiss plaintiff first amended complaint, without prejudice to amend said complaint no later than June 19, 2020 (30 days from May 20, 2020). On or about May 30, 2020 plaintiff efiled a second amended complaint in the above captioned matter. On June 25, 2020 I had written to Your Honor, requesting a stay of the above matter for the above reasons. Defense counsel indicated that if I did not withdraw my second amended complaint by July 1, 2020, she would move for Rule 11 sanctions against my client in this case which is in the pleading, pre-discovery stage. My client terminated me as his attorney by virtue of a June 24, 2020, 422PM email, which was attached to my June 25, 2020 letter to Your Honor, so I am unable at present to respond to any defendant motion to dismiss my second amended complaint.

I have not yet received a response to my June 25, 2020 letter to Your Honor, referencing the above mentioned request.

May I kindly have a response to my June 25, 2020 letter as soon as possible.

Very truly yours,


Gary S. Fish (GSF 6551)

GSF:wp

cc: Jahumi Harrigan

cc. BY ECF, Mary Beth Allen, Esq. Assistant Corporation Counsel, Office of Corporation Counsel, City of New York, Attorney for Defendants

Plaintiff's request to stay the case is GRANTED, and the case is stayed until August 2, 2020. Defense counsel has indicated an intention of filing a motion to dismiss and for sanctions under Rule 11. If there is no update from Plaintiff by the end of the stay period, Defendant may make its motion on or after August 2, 2020.

The Clerk of Court is respectfully directed to close the pending motions at Dkt. Nos. 70 and 71.

SO ORDERED.

7/1/2020

SO ORDERED.



LEWIS J. LIMAN
United States District Judge